

**UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN**

YAACOV APELBAUM, a New York resident,  
and XRVISION, LTD., a New York corporation,

Plaintiffs,

Case No. 2:23-cv-11718

v.

Hon. Stephen J. Murphy, III  
Hon. Anthony P. Patti

STEFANIE LAMBERT, a Michigan resident, and  
THE LAW OFFICE OF STEFANIE L. LAMBERT,  
PLLC, a Michigan professional limited liability company  
and BILL BACHENBERG, a Pennsylvania resident,

Defendants.

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**DECLARATION OF JOHN C. BURNS, ESQ.**

I, John C. Burns, attorney for Plaintiffs, swear under penalty of perjury that to best of my knowledge, ability and belief, the facts contained in Plaintiffs' Notice of Compliance and Attempted Compliance with the Court's Order of December 12, 2023, and Request for Relief is correct and accurate.

Dated: January 5, 2024

Respectfully submitted,

/s/ John C. Burns  
John C. Burns